

William P. Weintraub
Gregory W. Fox
GOODWIN PROCTER LLP
The New York Times Building
620 Eighth Avenue
New York, New York 10018
T: 212-813-8800
E: wweintraub@goodwinlaw.com
E: gfox@goodwinlaw.com

Counsel for Pre-Closing
Accident Plaintiffs Represented by
Hilliard Martinez Gonzales L.L.P. and
Thomas J. Henry Injury Attorneys

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	: Chapter 11
MOTORS LIQUIDATION COMPANY, et al.,	: Case No.: 09-50026 (MG)
f/k/a General Motors Corp., et al.,	:
	:
Debtors.	: (Jointly Administered)
	-X

**NOTICE OF WITHDRAWAL AS COUNSEL OF RECORD
FOR CERTAIN MOVANTS UNDER OMNIBUS MOTIONS BY CERTAIN
PRE-CLOSING ACCIDENT PLAINTIFFS FOR AUTHORITY TO
FILE LATE PROOFS OF CLAIM FOR PERSONAL INJURIES
AND WRONGFUL DEATHS [DOCKET NOS. 13807 AND 14325]**

WHEREAS, Goodwin Procter, LLP (“**Goodwin**”) represents the law firms of Hilliard Martinez Gonzales L.L.P. (“**HMG**”) and Thomas J. Henry Injury Attorneys (“**TJHIA**”) in connection with their representation of claimants asserting personal injury and wrongful death claims against the debtors in the above-captioned chapter 11 cases (“**Old GM**”) and General Motors LLC (“**New GM**”).

WHEREAS, on December 22, 2016, Goodwin filed that certain *Omnibus Motion By Certain Ignition Switch Pre-Closing Accident Plaintiffs for Authority to File Late Proofs of Claim for Personal Injuries and Wrongful Deaths* [Docket No. 13807] (the “**Late Claims Motion**”) on behalf of those certain HMG and TJHIA clients listed on Exhibit A to the Late Claims Motion (the “**Late Claims Movants**”). Attached as Exhibit B to the Late Claims Motion were copies of each Late Claims Movant’s proposed proof of claim against Old GM’s chapter 11 estate.

WHEREAS, on May 25, 2018, Goodwin filed that certain *Supplemental Omnibus Motion By Certain Pre-Closing Accident Plaintiffs for Authority To File Late Proofs of Claim for Personal Injuries and Wrongful Deaths In Connection with Settlement with the Motors Liquidation Company GUC Trust* [Docket No. 14325] (the “**Supplemental Late Claims Motion**” and, together with the Late Claims Motion, the “**Late Claims Motions**”) on behalf of those certain HMG and TJHIA clients listed on Exhibit A to the Supplemental Late Claims Motion (the “**Supplemental Late Claims Movants**” and, collectively with the clients listed on Exhibit A to the Late Claims Motion, the “**Late Claims Movants**”). Attached as Exhibit B to the Supplemental Late Claims Motion were copies of each Supplemental Late Claims Movant’s proposed proof of claim against Old GM’s chapter 11 estate.

WHEREAS, on December 4, 2017, Goodwin filed a *Notice of Withdrawal as Counsel of Record for Certain Movants Under Omnibus Motion By Certain Ignition Switch Pre-Closing Accident Plaintiffs for Authority to File Late Proofs of Claim for Personal Injuries and Wrongful Deaths [Docket No. 13807]* [Docket No. 14179], pursuant to which Goodwin withdrew as counsel to certain Movants that were no longer clients of HMG and TJHIA pursuant to Order No. 137 entered in the multi-district litigation pending before the Honorable Jesse M. Furman of the United States District Court for the Southern District of New York, *In re General Motors LLC Ignition Switch Litigation*, MDL No. 2543 (JMF) (S.D.N.Y.) (the “**MDL**”) [MDL Docket No. 4840]. Notice was given to each such former client to retain new counsel or to proceed *pro se* as to the Late Claims Motion or Supplemental Late Claims Motion (as applicable) because neither Goodwin, HMG, nor TJHIA would be prosecuting either of such motions on their behalf.

WHEREAS, on April 25, 2018, Goodwin filed a *Second Notice of Withdrawal as Counsel of Record for Certain Movants Under Omnibus Motion By Certain Ignition Switch Pre-Closing Accident Plaintiffs for Authority to File Late Proofs of Claim for Personal Injuries and Wrongful Deaths [Docket No. 13807]* [Docket No. 14282], pursuant to which Goodwin withdrew as counsel to certain additional Late Claims Movants that were no longer clients of HMG and TJHIA in the MDL. Notice was given to each such former client to retain new counsel or to proceed *pro se* as to the Late Claims Motion or Supplemental Late Claims Motion (as applicable) because neither Goodwin, HMG, nor TJHIA would be prosecuting either of such motions on their behalf. The Late Claims Movants for whom Goodwin previously withdrew as counsel are identified on Exhibit B hereto (collectively, the “**Previously Withdrawn Late Claims Movants**”).

WHEREAS, most of the Late Claims Movants whom HMG and TJHIA represent in the MDL have reached a settlement with New GM pursuant to which, *inter alia*, these settling plaintiffs have agreed to withdraw their proofs of claim from the Motions. The Late Claims Movants who have reached settlements with New GM are identified on Exhibit C hereto (collectively, the “**Settling Plaintiffs**”).

WHEREAS, five of the Late Claims Movants, each identified on Exhibit A hereto (the “**Affected Movants**”), have not agreed to settle their claims against New GM or withdraw their Late Claims Motion or Supplemental Late Claims Motion (as applicable) seeking allowance of their proofs of claim against Old GM’s chapter 11 estates.

WHEREAS, HMG and TJHIA filed a formal motion to withdraw in the MDL for one of the Affected Movants (Nicole Jaure), which motion the MDL court granted on June 13, 2018 [MDL Docket No. 5685].

WHEREAS, on November 11, 2019, HMG and TJHIA notified Affected Movant Tammie Marshall, of the withdrawal of those firms as her counsel. HMG and TJHIA did not file a motion to withdraw in the MDL because Ms. Marshall did not have a complaint or claims pending in the MDL.

WHEREAS, on December 6, 2019, HMG and TJHIA filed a formal motion to withdraw in the MDL for three of the Affected Movants (Lynda Duncan, Christopher Gracia, and Diedra Shipman) [MDL Docket Nos. 7575, 7576 and 7578].

NOW THEREFORE, PLEASE TAKE NOTICE THAT, pursuant to Rule 2090-1(f) of the Local Bankruptcy Rules for the Southern District of New York, Goodwin withdraws as counsel of record for the Affected Movants in these chapter 11 cases and will not be prosecuting

the Late Claims Motion or Supplemental Late Claims Motion (as applicable) on behalf of the Affected Movants.

PLEASE TAKE FURTHER NOTICE THAT, the Settling Plaintiffs hereby affirmatively withdraw their proofs of claim from the Late Claims Motion or Supplemental Late Claims Motion (as applicable).

PLEASE TAKE FURTHER NOTICE THAT, due to the settlement among the Settling Plaintiffs and New GM, Goodwin will not be prosecuting either of the Late Claims Motion or the Supplemental Late Claims Motion on behalf of any of the Late Claims Movants (including the Affected Movants, the Previously Withdrawn Late Claims Movants and the Settling Plaintiffs).

PLEASE TAKE FURTHER NOTICE THAT, HMG and TJHIA will provide the Affected Movants and the Previously Withdrawn Late Claims Movants with a copy of this notice in order to give them an opportunity to find replacement counsel to prosecute the Late Claims Motion or Supplemental Late Claims Motion (as applicable), to act *pro se*, or to otherwise pursue authority to file a late proof of claim in these chapter 11 cases.

Dated: December 9, 2019

Respectfully submitted,

/s/ William P. Weintraub
William P. Weintraub
Gregory W. Fox
GOODWIN PROCTER LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018
Tel.: 212.813.8800
Fax: 212.355.3333
wweintraub@goodwinlaw.com
gfox@goodwinlaw.com

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